

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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Roy Romer
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Thomas M. Vernon, M.D.
Executive Director

SEP 6 1989

Rocky Flats Area Office
U.S. Department of Energy
P.O. Box 928
Golden, CO 80402-0928

Attn: Mr. Edward S. Goldberg, Acting Manager,
U.S. Department of Energy
Mr. Dominick J. Sanchini, President and General Manager,
Rockwell International

Re: 881 Hillside Interim Remedial Action

Dear Messrs. Goldberg and Sanchini:

The Colorado Department of Health, Division of Hazardous Materials and Waste Management ("the Division") and the U.S. Environmental Protection Agency, Region VIII have preliminary comments on the proposed 881 Hillside Interim Remedial Action as presented during the August 25, 1989 meeting. It is the Division's and EPA's understanding that the May 1989 proposal will be revised to reflect the changes presented in the meeting and that the new draft will be received within two weeks of the meeting date.

In order for the Division and EPA to review and approve the revised proposal, all 1988 and 1989 ground-water monitoring data for the wells in the 881 Hillside area must be submitted to both agencies. Data received by the Division under an earlier information request was not complete. The ground water data is necessary to evaluate the location and depth of the proposed interceptor trench.

Geologic mapping is necessary during trench construction to confirm that the specified hydraulic conductivity requirements are met. The trench depth to be proposed shall be based on the hydraulic conductivity of the geologic unit in which the trench is completed and on the extent of vertical migration over the treatment time. This revised proposal must address a method that verifies the hydraulic conductivity. The calculation for the projected vertical extent of migration must consider the time required to meet ARARs for ground water.

The Division and EPA find it appropriate to extend the trench eastward to capture ground water flowing from SMU 119.2.

ADMIN RECORD

A-DUC1-000053

REVIEWED FOR CLASSIFICATION

By R. B. Hoffman

Date 6-13-90

REVIEWED FOR CLASSIFICATION/UCNI

By George H. Lott

Date 6/13/90

Any necessary changes to the NDEES permit as a result of discharging treated ground water into the South Interceptor Ditch (SID) need to be addressed. The proposal shall consider alternatives to discharging into the SID. One option is infiltrating the treated ground water back into the 881 Hillside upgradient of the proposed trench. The process would begin flushing the soils of contaminants thus speeding up the overall cleanup process and have less of an impact on the downgradient ponds.

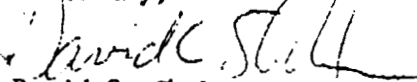
In order to monitor possible releases from the trench system, a ground water monitoring system capable of monitoring the downgradient water quality must be implemented and the trench liner must be constructed with a leak detection system.

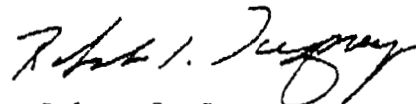
In regard to the treatment system, the proposal must evaluate the option of placing the UV peroxide chamber after the metals removal unit in order to better deal with iron removal. The means for regenerating the uranium removal unit must be described in the revised draft.

Once the plan is approved by the Division and EPA, the plan may undergo public comment. In this regard, the Division would appreciate three copies of the revised proposal.

The Division and EPA would like to continue working with your staff in an accelerated manner to begin remediation at the 881 Hillside. If you have any questions regarding these comments, please contact Fred Dowsett or Patricia Corbetta of the Division at 331-4830 or Martin Hestmark of EPA at 293-1506.

Sincerely,


David C. Shelton
Director
Hazardous Materials and
Waste Management Division


Robert L. Duprey
Director
Hazardous Waste Management
Division

cc:

Joan Sowinski, CDH
Paul Frohardt, CDH
Lou Johnson, EPA
Nat Miullo, EPA
Tim Moleman, Gov. office
Howard Brown, RFEMC
Ronald Hellbusch, City of Westminster

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